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January 24, 2003

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RECEIVED

JAN 24 2003

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA COURIER

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: SNIPLiNK, LLC
WCB Docket Nos. 01-338, 96-98, 98-147
Notice of *Ex Parte* Presentation

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission's rules, SNIPLiNK, LLC ("SNIPLiNK"), by its undersigned counsel, hereby gives notice that on January 23, 2003, its representatives met with Commissioner Kevin J. Martin and Daniel Gonzalez, Senior Legal Advisor to Commissioner Martin, to discuss SNIPLiNK's views on the FCC UNE Triennial Review proceeding. Representing SNIPLiNK along with the undersigned were Anthony Abate, President & Chief Technology Officer, and Joseph Polito, Director of Telecommunications Products. A copy of SNIPLiNK's presentation materials are enclosed.

No. of Copies rec'd _____
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KELLEY DRYE & WARREN LLP

Ms. Marlene H. Dortch
January 24, 2003
Page 2

In accordance with Section 1.1026(b), **an** original and one copy of this notice is being provided.

Sincerely,



Steven A. Augustino

SAA/pab
Enclosures

cc: Commissioner Kevin J. Martin
Daniel Gonzalez

SNiP LiNK, LLC

Ex Parte Presentation

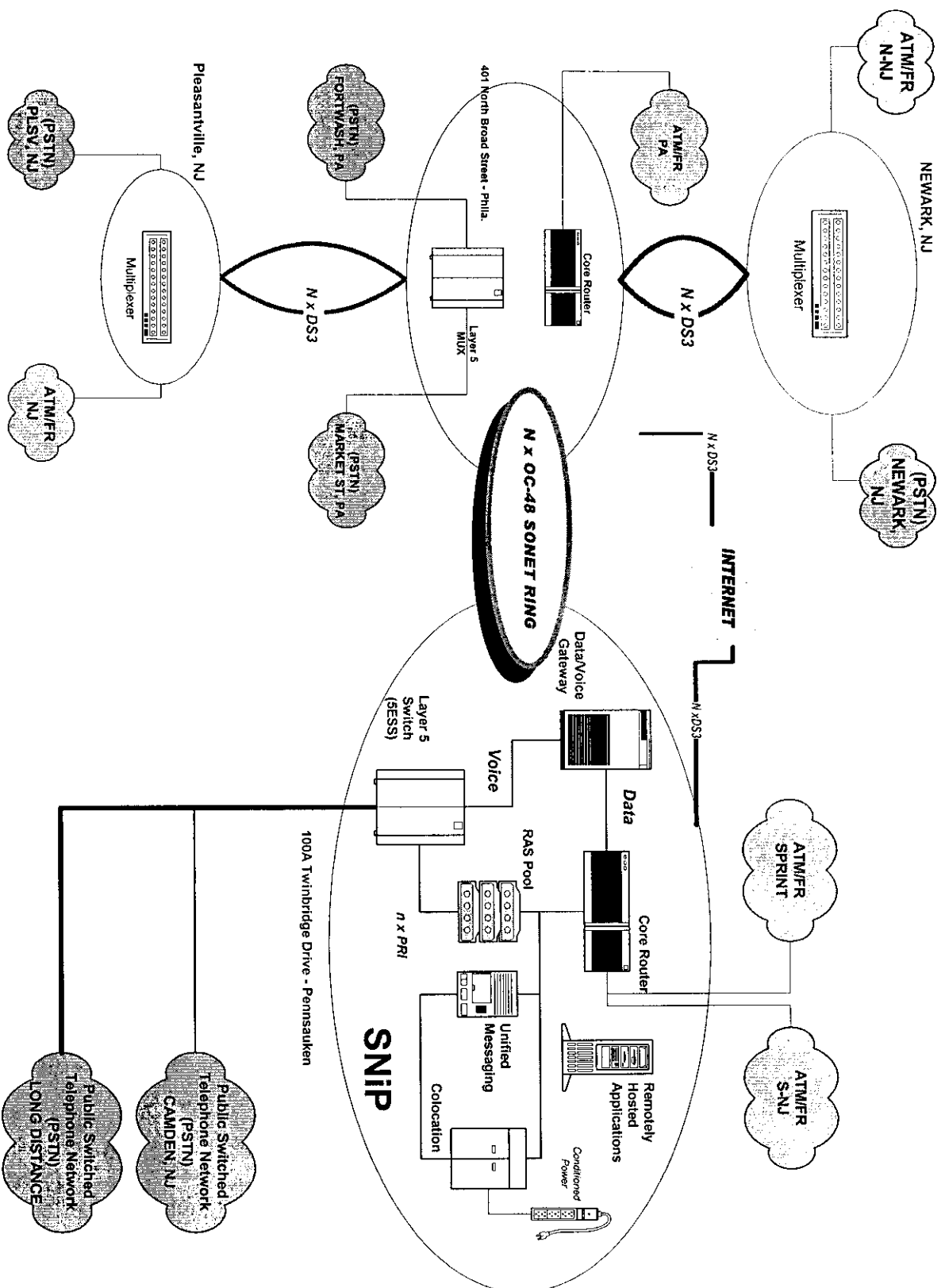
UNE Triennial Review
WCB Docket Nos. 01-338, 96-98, 98-147
January 23, 2003



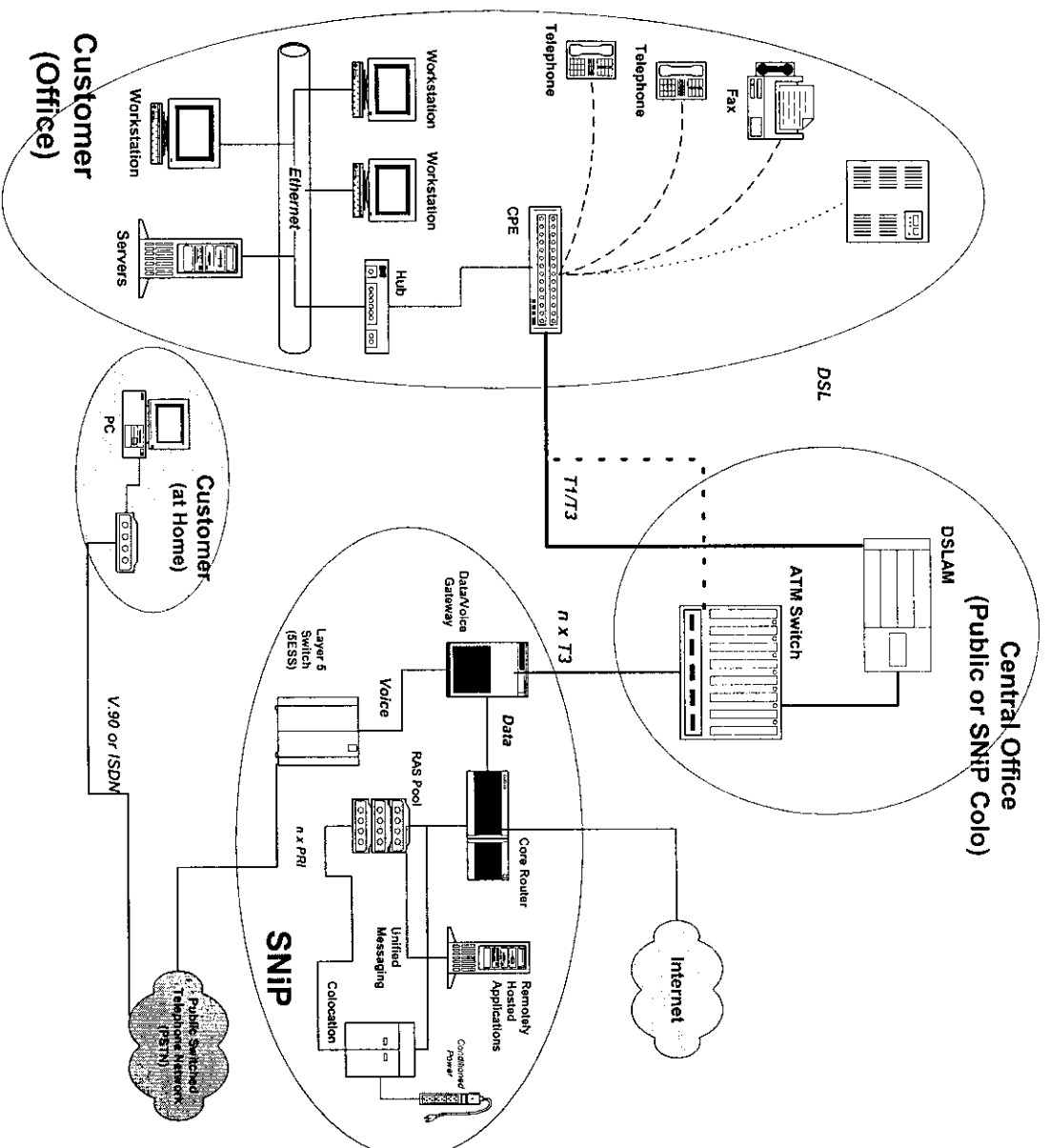
About SNIPLINK

- Founded in 1995, SNIPLINK is a privately held ISP-CLEC serving New Jersey, Delaware and Southeastern Pennsylvania
- SNIPLINK's network consists of a self-provisioned SONET ring between its Philadelphia, Pennsauken and Merchantville POIs and leased capacity to its Newark and Pleasantville POIs. No loop facilities, no metro fiber
- Customers include schools, small businesses and state agencies. SNIPLINK offers converged voice and internet access products, typically replacing ILEC analog Centrex service

■ **Profitable**



SNiP LiNK Network Diagram



Integrated Communication Solutions

EELs

EELs are **critical** to SNIp LiNK's ability to provide LEC services

➤ *only way* for SNIp LiNK to reach customers in areas such as Plymouth Meeting (Philadelphia suburb), Middletown, DE or Cape May, NJ

➤ No third party transport is available; special access is ***not*** economical

Alleged impact of EELs on special access/IXC service has not been substantiated

EELS

If the Commission concludes limits are appropriate, SNiP LiNK supports the proposal set forth in NuVox's ex partes

- EELs should be ubiquitously available except to provide stand alone voice long distance

LEC services may be shown by

Collocation *or its equivalent*

- Local interconnection trunks

Tariffed LEC services

EELs

EELs must be available for integrated T-1 products. No data penalty

No traffic measurement criteria

No onerous audit rights. Audits generally will be unnecessary

No “commingling” or other LEC-imposed restrictions

Transport

Availability of transport alternatives must be determined on a route-specific basis

No ILEC gaming: “A to B” route may not be broken into physical “segments” to avoid UNE availability

Must have 3 actual wholesale alternatives on the route

Self-provisioning or new construction is too costly and time consuming

Transport

Alternatives must be available as a practical, economic and operational matter

123 No restrictions on use with other UNEs or LEC services

124 Cross-connects must be feasible, reasonably priced and meet service quality requirements

Multi-vendor interconnection procedures must be feasible; duplicative costs must not be prohibitive

Conclusion

EELs are critical to SNiP LiNK's ability to offer services

The FCC should make EELs ubiquitously available for LEC services and integrated products

Transport should be analyzed on a route-specific basis

Transport alternatives must be available from a practical, economic and operational perspective. Theoretical alternatives are insufficient